

N60201.AR.000212  
NS MAYPORT  
5090.3a

LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING INTERIM REMEDIATION WORK PLAN FOR SOLID WASTE  
MANAGEMENT UNIT 2 PCB AREA NS MAYPORT FL  
4/18/1995  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Lawton Chiles  
Governor

# Department of Environmental Protection

Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Naval Station Mayport  
Administrative Record  
09.01.00.0087

Virginia B. Wetherell  
Secretary

April 18, 1995

Mr. David Driggers  
Department of the Navy, Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive, P.O. Box 190010  
North Charleston, SC 29419-9010

file: swmu2\_wp.doc

RE: Interim Remediation Work Plan for SWMU 2 PCB Area; U.S. Naval Station Mayport;  
Bechtel Environmental, Revision 0

Dear David:

I have reviewed the subject Work Plan dated January 1995 (received March 29, 1995) and offer the following comments:

1. Where will the new wells be placed? A licensed well driller should be utilized for all well abandonment and construction and the appropriate documentation provided to the St. Johns River Water Management District and/or Duval County. Additionally, well cuttings and development water should be properly disposed of.
2. The proposed areas of excavation and confirmatory sampling as shown on Figure 6-1 do not include all areas which have been previously determined (Figure 2-2) to contain PCBs in excess of 1 ppm. The text does not state how these areas are to be remediated. Please make this correction; and if appropriate, submit a drawing showing these changes.
3. Section 5.1.1, Decontamination, states that fluids resulting from decontamination will be disposed of in accordance with the Navy Public Works Department. How will these fluids be disposed of by Navy PWD, especially if they are contaminated with PCBs?
4. The information concerning the field PCB sampling kits is incomplete and is marked "Draft" and "unofficial." These methods are not included in the FDEP SOP Manual. What are the procedures that will be followed in using the field screening kits? What is the expected level of accuracy in the determinations (briefly)? Where are the sampling points for the second round of sampling, after initial excavation? Are they superimposed from the initial sample points?

Mr. David Driggers  
April 18, 1995  
Page 2

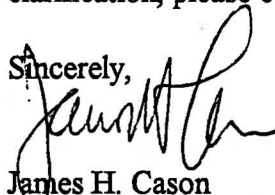
5. In Appendix D, Section 3.8.4, it is stated that Bechtel is not responsible for the operation of the decontamination facility. Is this true or is it caused by the "cut & paste" method of document preparation? Who is responsible for the operation of the facility?

Following are comments from Greg Brown in a letter to you on November 3, 1994, concerning the previous version of the Work Plan. Please respond to them.

6. On-site contaminated soil handling and management should be described in better detail (the referenced engineering drawings will help here).
7. Vadose soil sampling during monitoring well reinstallation should be described in the work plan.

You may send the responses directly to me and I will make them part of the Work Plan. If you have questions or require further clarification, please contact me at (904) 488-3935.

Sincerely,



James H. Cason  
Remedial Project Manager

cc: Cheryl Mitchell, NAVSTA Mayport  
Jay Bassett, EPA Region IV, Atlanta  
John Mitchell, FDEP Natural Resource Trustee  
Satish Kastury, FDEP, Tallahassee  
Ashwin Patel, FDEP Northeast District, Jacksonville  
Brian Cheary, FDEP Northeast District, Jacksonville  
Jerry Young, City of Jacksonville

TB 3 JJC JE ESN ESN